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INTRODUCTION

Scope and Applicability

This SOP offers detailed guidance in evaluating laboratory data generated according to the methods in the "USEPA Contract Laboratory Program Statement of Work Pages for Organics Analysis Low Concentration Water OLC03.2," December 2000. The validation methods and actions discussed in this document are based on the requirements set forth in the "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review," June 2001. This document attempts to cover technical as well as contractual problems specific to each fraction; however, situations may arise where data limitations must be assessed based on the reviewer's own professional judgement.

In addition to technical requirements, contractual requirements are also covered in this document. While it is important that instances of contract non-compliance be addressed in the Data Assessment, the technical criteria are always used to qualify the analytical data.

Summary

To ensure a thorough evaluation of each result in a data case, the reviewer must complete the checklist within this SOP, answering specific questions while performing the prescribed "ACTIONS" in each section. Qualifiers (or flags) are applied to questionable or unusable results as instructed. The data qualifiers discussed in this document are as follows:

Data Qualifiers

- U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- J - The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
- N - The analysis indicates the presence of an analyte for

which there is presumptive evidence to make a "tentative identification."

- NJ - The analysis indicates the presence of an analyte that has been "tentatively identified" and the associated numerical value represents its approximate concentration.
- UJ - The analyte was not detected above the reported sample quantitation limit. However, the reported quantitation limit is approximate and may or may not represent the actual limit of quantitation necessary to accurately and precisely measure the analyte in the sample.
- R - The sample results are rejected due to serious deficiencies in the ability to analyze the sample and meet quality control criteria. The presence or absence of the analyte cannot be verified.

Lab Qualifiers:

- D - The positive value is the result of an analysis at a secondary dilution factor.
- B - The analyte is present in the associated method blank as well as in the sample. This qualifier has a different meaning when validating inorganic data.
- E - The concentration of this analyte exceeds the calibration range of the instrument.
- P - Pesticide/Aroclor target analytes when the % Difference between the analyte concentrations obtained from the two dissimilar GC columns is greater than 25%.

The reviewer must prepare a detailed data assessment to be submitted along with the completed SOP checklist. The Data Assessment must list all data qualifications, reasons for qualifications, instances of missing data and contract non-compliance.

Reviewer Qualifications:

Data reviewers must possess a working knowledge of the USEPA Statement of Work OLC03.2 and National Functional Guidelines mentioned above.

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USEPA Region II

Method: CLP/SOW, OLC03.2

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YES NO N/A

for possible carryover. Use professional judgement to determine if carryover occurred and qualify analyte(s) accordingly.

5.5 Was a storage blank analyzed once per SDG after all the samples were analyzed?

ACTION: If storage blank data is missing, contact the TOPO to obtain any missing deliverables from the laboratory. If unavailable, note in the Contract Problems/Non-Compliance section of the Data Assessment.

5.6 The validator should verify that the correct identification scheme for EPA blanks was used. (See SOW page B-30, section 3.3.7.3 for more information.)

Was the correct identification scheme used for all Low Concentration VOA blanks?

ACTION: Contact the TOPO to obtain corrections from the lab, or make the necessary corrections. Document in the "Contract Problems/Non-Compliance section of the Data Assessment all corrections made by the validator.

5.7 Chromatography: review the blank raw data - chromatograms (RICs), quant. reports, data system printouts and spectra.

Also compare the storage blank raw data with the method blank. Determine if contamination in the storage blank is also present in the method blank.

Is the chromatographic performance (baseline stability) for each instrument acceptable for Low Concentration VOAs?

ACTION: Use professional judgement to determine the effect on the data.

5.8 Are all detected hits for target compounds in method, instrument and storage blanks less than the CRQL for that analyte?

[]

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YES NO N/A

NOTE: Contract Requirements: The SOW allows up to two of the required analytes (see compounds marked with a "*" on Form VI and Table D-2, page D-53/VOA) to fail contractual %RSD and RRF criteria, provided the %RSD is # 40.0 and RRF \$ 0.010.

ACTION: If more than two of the required analytes failed %RSD or RRF criteria, document in the Data Assessment under Contract Problems/Non-Compliance.

12.4 Are there any transcription/calculation errors in the reporting of RRFs, RRFs or %RSD values? (Check at least 2 values, but if errors are found, check more.) ☐ ☐ ☐

ACTION: Circle errors in red.

ACTION: If errors are large, contact the TOPO to obtain an explanation/resubmittal from the lab, document in the Data Assessment under Contract Problems/Non-Compliance.

13.0 GC/MS Continuing Calibration (Form VII LCV)

13.1 Are the Continuing Calibration Forms (Form VII LCV) present and complete for the volatile fraction? ☐ ☐ ☐

13.2 Has a continuing calibration standard been analyzed for every twelve hours of sample analysis per instrument? ☐ ☐ ☐

ACTION: If any forms are missing or no continuing calibration standard has been analyzed within twelve hours of every sample analysis, ask the TOPO to obtain explanation/resubmittal from the laboratory. If continuing calibration data are unavailable, flag all associated sample data as unusable (R).

ACTION: List below all sample analyses that were not within twelve hours of the previous continuing calibration analysis.

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 YES NO N/A

ACTION: If errors are large, notify the TOPO to obtain explanation/resubmittals from the lab. Document errors in the Contract Problems/Non-Compliance section of the Data Assessment.

14.0 Internal Standard (Form VIII LCV)

14.1 Are the internal standard areas (Form VIII LCV) of every sample and blank within the upper and lower limits ($\pm 40\%$) for each continuing calibration? [] [] []

If no, was the sample reanalyzed? [] [] []

- ACTION: 1. Circle all outliers with red pencil.
 2. List all the outliers below.

Sample #	Int. Std.	Area	Lower Limit	Upper Limit
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

(Attach additional sheets if necessary,
 or attach copies of Form VIIIs.)

- ACTION: 1. If the internal standard area count is outside the **upper** limit, flag with "J" all positive results quantitated with this internal standard.
 2. Do not qualify non-detects when associated IS area counts are $> +40\%$.
 3. If the IS area is less than the lower limit (-40%), qualify "J" all positive results quantitated with this Internal Standard. Qualify "R" all non-detects.

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YES NO N/A
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differences exist, contact the TOPO to confirm identification of field duplicates with the sampler.

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 YES NO N/A

7.0 GC/MS Instrument Performance Check (Form V LCSV)

- 7.1 Are the GC/MS Instrument Performance Check Forms (Form V LCSV) for Decafluorotriphenylphosphine (DFTPP) present? ☐ ☐ ☐
- 7.2 Are the enhanced bar graph spectrum and mass/charge (m/z) listing for the DFTPP provided for each twelve hour shift? ☐ ☐ ☐
- 7.3 Has an instrument performance check solution been analyzed for every twelve hours of sample analyses per instrument? ☐ ☐ ☐

ACTION: List samples, date, time and instrument ID for which no associated GC/MS tuning data are available.

SAMPLE ID	DATE	TIME	INSTRUMENT ID
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

ACTION: If lab cannot provide missing data, reject (R) all data generated outside an acceptable twelve hour calibration interval.

- 7.4 Have the ion abundances been normalized to m/z 198? ☐ ☐ ☐

NOTE: All ion abundance ratios must be normalized to m/z 198, the nominal base peak, even though the ion abundance of m/z 442 may up to 110% that of m/z 198.

ACTION: If mass assignment is in error, flag all associated sample data as unusable (R).

- 7.5 Have the ion abundance criteria been met for each instrument used? ☐ ☐ ☐

ACTION: If ion abundance criteria are not met, professional

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 YES NO N/A

c. Blanks [] ____ ____

ACTION: If any data are missing, take action as specified in 3.1 above.

8.3 Is chromatographic performance acceptable with respect to:

Baseline stability? [] ____ ____

Resolution? [] ____ ____

Peak shape? [] ____ ____

Full-scale graph (attenuation)? [] ____ ____

Other: _____? [] ____ ____

ACTION: Use professional judgement to determine the acceptability of the data.

8.4 Are the lab-generated standard mass spectra of identified Low Concentration semivolatile compounds present for each sample?

[] ____ ____

ACTION: If any mass spectra are missing, take action specified in 3.1 above. If lab does not generate their own standard spectra, make note in "Contract Problems/Non-Compliance". If spectra are missing, reject the reported result(s).

8.5 Is the RRT of each reported compound within ± 0.06 RRT units of the standard RRT in the continuing calibration?

[] ____ ____

8.6 Are all ions present in the standard mass spectrum at a relative intensity greater than 10% also present in the sample mass spectrum?

[] ____ ____

8.7 Do sample and standard relative ion intensities agree within $\pm 20\%$?

[] ____ ____

ACTION: Use professional judgement to determine the acceptability of the data. If it is determined that incorrect identifications were made, all such data should be rejected (R) flagged "N" (Presumptive

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YES NO N/A

evidence of the presence of the compound) or changed to not detected (U) at the calculated detection limit. In order to be positively identified, the data must comply with the qualitative identification criteria listed in SOW section 11.1, page D-29/SV.

ACTION: When sample carry-over is a possibility, professional judgement should be used to determine if instrument cross-contamination has affected any positive compound identification.

9.0 Tentatively Identified Compounds (TIC)

9.1 Are all Tentatively Identified Compound Forms (Form I LCSV-TIC) present; and do listed TICs include scan number or retention time, estimated concentration and "JN" qualifier? ☒ ☐ ☐

9.2 Are the mass spectra for the tentatively identified compounds and associated "best match" spectra included in the sample package for each of the following:

a. Samples and/or fractions as appropriate? ☒ ☐ ☐

b. Blanks? ☒ ☐ ☐

ACTION: If any TIC data are missing, take action specified in 3.1 above.

ACTION: Add "JN" qualifier to all chemically named TICs.

9.3 Are any TCL compounds (from any fraction) listed as TIC compounds (example: 1,2- dimethylbenzene is xylene a VOA TCL and should not be reported as a TIC)? ☐ ☒ ☐

ACTION: Flag "R" only TCL compound detected in another fraction. (Except blank contamination)

9.4 Are all ions present in the reference mass spectrum with a relative intensity greater than 10% also present in the sample mass spectrum? ☒ ☐ ☐

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S))
YES NO N/A

9.5 Do TIC and "best match" standard relative ion intensities agree within $\pm 20\%$? ☒ ☐ ☐

ACTION: Use professional judgement to determine the acceptability of TIC identifications. If it is determined that an incorrect identification was made, change identification to "unknown" or to some less specific identification (example: "C3 substituted benzene") as appropriate. In order to be positively identified, the data must comply with the criteria listed in SOW section 11.2, page D-30/SV.

Also, when a compound is not found in any blank, but is a suspected artifact of a common laboratory contaminant, the result should be qualified as unusable (R). Common lab contaminants could be solvent preservatives, such as Cyclohexene. Related by-products include Cyclohexanone, Cyclohexanol, Chlorocyclohexene and Chlorocyclohexanol. Aldol reaction products of Acetone include 4-hydroxy-4-methyl-2-pentanone, 4-methyl-2-penten-2-one, and 5,5-dimethyl-2-(5H)-furanone.

10.0 Compound Quantitation and Reported Detection Limits

10.1 Are there any transcription/calculation errors in Form I results? Check at least two positive values. Verify that the correct internal standard, quantitation ion, and RRF were used to calculate Form I result. Were any errors found? ☐ ☒ ☐

10.2 Are the CRQLs adjusted to reflect sample dilutions? ☒ ☐ ☐

ACTION: If errors are large, notify the TOPO to obtain an explanation/resubmittal, make any necessary corrections and document effect in data assessments.

ACTION: When a sample is analyzed at more than one dilution, the lowest CRQLs are used (unless a QC exceedance dictates the use of the higher CRQL data from the diluted sample analysis). Replace concentrations that exceed the calibration range in the original analysis by crossing out the "E" and it's associated value on the original Form I and substituting the data from the analysis of the diluted sample. Specify which Form I

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S)) YES NO N/A
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is to be used, then draw a red " X" across the entire page of all Form I's that should not be used, including any in the summary package.

11.0 Standards Data (GC/MS)

11.1 Are the Reconstructed Ion Chromatograms, and data system printouts (Quant, Reports) present for initial and continuing calibration? ☒ ☐ ☐

ACTION: If any calibration standard data are missing, take action specified in 3.1 above.

12.0 GC/MS Initial Calibration (Form VI LCSV)

12.1 Are the Initial Calibration Forms (Form VI LCSV-1 & -2) present and complete for the Low Concentration Semivolatile fraction at concentrations of 5, 10, 20, 50 and 80 ug/l? ☒ ☐ ☐

NOTE: Seven compounds, 2,4-Dinitrophenol, 2,4,5-Trichlorophenol 2-Nitroaniline, 3-Nitroaniline, 4-Nitroaniline 4-Nitrophenol, 4,6-Dinitro-2-methylphenol, require calibration at 20, 50, 80, 100 and 120 ug/l.

ACTION: If any calibration standard forms are missing, take action specified in 3.1 above.

NOTE: There are nineteen (19) semivolatile compounds (see Table below) which are poor performers. The RRF for these compounds must be greater than or equal to 0.01 The %RSD must be less than or equal to 50%. The %RSD must be less than or equal to 30% for 2,4-Dinitrotoluene, 2-Nitrophenol, and 2,4-Dimethylphenol, and less than or equal to 20.5% for all other compounds and DMC's.

SEMIVOLATILE COMPOUNDS WITH POOR RESPONSE

SEMIVOLATILE COMPOUNDS

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S))
YES NO N/A

every sample analysis, notify the TOPO to obtain explanation/resubmittals. If continuing calibration data are not available, flag all associated sample data as unusable (R).

13.3 Do any semivolatile compounds have a %D between the initial RRF and continuing RRF which exceeds the $\pm 25.0\%$ criteria? 11

ACTION: Circle all outliers in red.

ACTION: Qualify both positive results and non-detects for the outlier compound(s) as estimated (J). When %D is > 90%, reject all non-detects for that analyte (R) unusable and positive results "J".

13.4 Do any semivolatile compounds have a RRF < 0.05, <0.01 for the poor performers? 11

ACTION: Circle all outliers with red pencil.

ACTION: If the RRF is < 0.05, < 0.01 for the poor performers, qualify associated positive results estimated (J) and non-detects unusable (R).

13.5 Are there any transcription/calculation errors in the reporting of continuing RRFs or %D between initial RRFs and continuing RRFs? (Check at least two values, but if errors are found check more.) 11

ACTION: Circle errors with red pencil.

ACTION: If errors are large, notify the TOPO to obtain explanation/resubmittals, make any necessary corrections and document the effect in the data assessment.

14.0 Internal Standards (Form VIII LCSV)

14.1 Are the Internal Standard Area and RT Summary Forms (Form VIII LCSV-1 & -2) present and complete for the semivolatile fraction? 11

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YES NO N/A

ACTION: Professional judgement should be used to qualify data
if the retention times differ by more than 20 seconds.

15.0 Field Duplicates

15.1 Were any field duplicates submitted for Low
Concentration semivolatile analysis? 1

ACTION: Compare the reported results for field duplicates and
calculate the relative percent difference.

ACTION: Any gross variation between field duplicate results
must be addressed in the reviewer narrative. If large
differences exist, contact the TOPO to confirm
identification of field duplicates with the sampler.

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 YES NO N/A

ACTION: If either surrogate spike recovery is outside the acceptance limits, the Validator must consider the existence of coelution and interference in the raw data and use professional judgement as described below, as surrogate recovery problems may not directly apply to target analytes.

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S))
 YES NO N/A

NOTE: If %D is > 25.0, lab should have reported results with the "P" qualifier.

ACTION: If the reviewer finds neither column shows interference for the positive hits, the data should be flagged as follows:

<u>% Difference</u>	<u>Qualifier</u>
0 - 25%	None
26 - 70%	"J"
71 - 100%	"JN"
> 100%	"R"
100 - 200% (Interference detected)*	"JN"
> 50% (Pesticide value is < CRQL)**	"U"

* When the reported %D is 100 - 200%, but interference is suspected on either column, qualify the data with "J".

** When the reported pesticide value is lower than the CRQL, and the %D is > 50%, raise the value to the CRQL and qualify "U", undetected.

NOTE: For Aroclors, if the %D is > 50%, but the pattern of GC peaks on both columns indicates a specific Aroclor is present, qualify that Aroclor "J".

NOTE: The lower of the two values is reported on Form I. If using professional judgement, the reviewer determines that the higher result was more acceptable, the reviewer should replace the value and indicate the reason for the change in the Data Assessment.

11.6 Check chromatograms for false negatives (especially the multiple peak compounds Toxaphene and PCBs). Were there any false negatives? 1

ACTION: Use professional judgement to decide if the compound should be reported. If the appropriate Aroclor standards were not analyzed within 72 hrs. of the sample(s) in question, qualify the data unusable (R).

Also note in Data Assessment under Contract Problems/Non-Compliance if the lab failed to analyze Aroclor standards when required.

ACTION: Quantitation limits affected by large, off-scale peaks should be qualified as unusable (R). If the interference is on-scale, the reviewer may offer an approximated quantitation limit (UJ) for each affected compound.

NOTE: If a sample required greater than a 10 times dilution, then a 10 times more concentrated analysis must also be performed and submitted (see SOW, page D-41/PEST, section 10.2.3.5).

ACTION: If a more concentrated analysis is unavailable, document in the Contract Problems/Non-Compliance section of the Data Assessment. Use professional judgement to qualify non-detects and positive hits below the CRQL.

14.0 Field Duplicates

14.1 Were any field duplicates submitted for
Pest/Aroclor analysis?

 1

ACTION: Compare the reported results for field duplicates and calculate the relative percent difference.

ACTION: Any gross variation between field duplicate results must be addressed in the reviewer narrative. If large differences exist, contact the TOPO to confirm identification of field duplicates with the sampler.

Definitions

BFB - bromofluorobenzene
BHC - benzene hexachloride
BNA - base neutral acid
CADRE - Computer Aided Data Review and Evaluation
CARD - CLP Analytical Results Database
CCS - contract compliance screening
CLASS - Contract Laboratory Analytical Services Support
CLP - Contract Laboratory Program
CRQL - Contract Required Quantitation Limit
DCB -decachlorobiphenyl
DDD - dichlorodiphenyldichloroethane
DDE - dichlorodiphenylethane
DDT - dichlorodiphenyltrichloroethane
GC - gas chromatography
GC/EC - gas chromatography/electron capture detector
GC/MS - gas chromatography/mass spectroscopy
GPC - gel permeation chromatography
kg - kilogram
:g - microgram
MAGIC - Mainframe Access Graphical Interface with CARD
R - liter
LCS - Laboratory Control Sample
LES - Laboratory Evaluation Sample
mR - milliliter
PCB - Polychlorinated Biphenyl
PEM - Performance Evaluation Mixture
QC - quality control
RAS - Routine Analytical Services
RIC - reconstructed ion chromatogram
RPD - relative percent difference
RRF - relative response factor
RRF - average relative response factor (from initial calibration)
RRT - relative retention time
RSD - relative standard deviation
RT - retention time
RSCC - Regional Sample Control Center
SDG - sample delivery group
SMC - system monitoring compound
SOP - standard operating procedure
SOW - Statement of Work
SVOA - semivolatile organic acid
TCL - Target Compound List
TCLP - Toxicity Characteristics Leachate Procedure
TCX -tetrachloro-m-xylene
TIC - tentatively identified compound
TPO - technical project officer
VOA - volatile organic acid

VTSR - validated time of sample receipt
TOPO - Task Order Project Officer

References

SOW/CLP OLC03.2

National Functional Guidelines (June 2001)

